

ORIGINAL

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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JAN 27 2007

at 8 o'clock and 25 min P.M.
SUE BEITIA, CLERK

ATTORNEY FOR PLAINTIFF

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

ROBERT SHEREZ,)	CIVIL NO. 04-00390 JMS-KSC
)	
Plaintiff,)	
)	SUPPLEMENTAL
vs.)	DECLARATION OF ROBERT SHEREZ
)	IN OPPOSITION TO THE
)	DEFENDANTS' MOTION FOR
STATE OF HAWAII DEPARTMENT)	SUMMARY JUDGEMENT;
OF EDUCATION; PATRICIA)	EXHIBITS 6 To 14;
HAMAMOTO, Superintendent of Hawaii)	CERTIFICATE OF SERVICE
Schools, MEREDITH MAEDA, Principal,)	
Castle High School; SARA GRONNER OR)	
GRONNA, Vice Principal of Castle High)	
School.)	
)	
Defendants.)	
)	

SUPPLEMENTAL DECLARATION OF ROBERT SHEREZ IN OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT

STATE OF HAWAII)
CITY AND COUNTY OF HONOLULU,) SS

ROBERT SHEREZ, being first duly sworn upon oath and upon
penalty of perjury deposes that:

1. Declarant is the plaintiff in the above-entitled action. And therefore am aware
of the facts and circumstances of this case.

off by the principal routinely.

3. Mr. Won had officially extended the time frame of the GED course to coincide with the time the GED testing time.

4. Enrollment in my class was continued by Mr. Won, the Registrar and secretaries until the very day I was fired.

5. Mr. Won told all students and the secretaries to tell the students that the date that the class ended had been extended. This extension was about two months.

6. Quite a few students quit the night class and quit their day jobs to enroll in my day class, that is why my class was so much larger than the other day classes.

7. None of teachers at McKinley school for Adults in 2003 was a certified teacher, and I was rated by the DOE at a Part-Time Teacher level Three, the highest level. And with 18 years of experience, teaching GED for other schools, I do challenge the Defendants statement they replaced me with a more qualified teacher.

8. Indeed the DOE used me and my class to make a film, to show the Board of Education, to obtain more funds for the McKinley School for adults (in conjunction with H.P.D, who did the filming).

9. Exhibit "6" is a true copy of an 11 Nov. 99 letter from the Pearl Harbor Police Department letter from Lt. Kirk Kama establishing that his police department requested my assistance in quelling a "highly volatile situation".

10. Exhibit "7" is a true of a June 26, 1989 letter from Sakae N. Loo, Windward District Superintendent letter thanking Ann M. Kawaguchi commending me for excellent performance for a "long term assignment for your class."

11. Exhibit "8" is a November 3, 2004 letter from Candace Sullivan, a Supervising RN

commending me for "providing excellent tutoring services for her son."

12. Exhibit "9" is a true copy of a Long Term Substitute Teacher Evaluation Report by the principal of the Aliamanu elementary school. Indicating I was requested. I was on 13 principal "preferred Principal's part-time or substitute teacher lists".

13. Exhibit "10" is a Certification of Completion of the Requirements of the Hawaii State Judiciary to become a Volunteer Guardian Ad Litem.

14. Exhibit "11" is a April 8, 1999 letter from the Fisher House @ Tripler chemotherapy patient parent, André M Penon, commending Mr. Sherez for counseling her son while he under went Chemotherapy treatment in the hospital and requesting that I be assigned further as his tutor.

15. Exhibit "12" is a true copy of my Notification of Employment Status to Employee dated 5/21/2002. This Notification verifies my 16 years of employment with the Windward District and states "This is notification that you have reasonable assurance of continuing employment in the same or similar capacity during the next school terms which starts August 2002.

16. Exhibit "13" is a true copy of the 5/24/ 2002 Notification of Employment Status to Employee from the Home Hospital Instruction program, notifying me "that you have reasonable assurance of continuing employment in the same or similar capacity during the next fall term."

17. Exhibit 14 is a true copy of a letter dated 3-14-03 from Richard Furmack, Ed. D. verifying that I worked well with the student I was assigned and that the student graduated.

18. The Defendants have breached the agreement stated in Exhibits 12 and 13, after I complained about gender bias in Castle High School Home Tutor I have never been steadily employed, nearly as much as I was by the DOE, considering all Districts and Positions, as I was

before 2003.

WHEREFORE, DECLARANT respectfully requests that the court deny the Defendant's Summary Judgment Motion and Grant Plaintiff's Counter Motion for Summary Judgment.

FURTHER DECLARANT SAYETH NAUGHT.


ROBERT SHEREZ, PLAINTIFF